UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

***

PUBLIC MEETING

ZION NUCLEAR POWER STATION UNITS 1 AND 2

POST SHUTDOWN DECOMMISSIONING

ACTIVITIES REPORT

Cafeteria

Zion-Benton High School

3901 21st Street

Zion, Illinois

Wednesday, April 26, 2000

The above-entitled meeting commenced, pursuant to notice, at 7:00 p.m.

PARTICIPANTS:

PETER CIONI, Community Advisory Panel, Moderator

DINO SCALETTI, Senior Project Manager,

Zion Nuclear Power Plant

BRUCE JORGENSEN, Chief, Region III Decommissioning

Branch

MIKE MASNIK, Chief, Decommissioning Section

JOHN HICKMAN, Project Manager, Headquarters

Decommissioning Section

PARTICIPANTS: [Continued]

STEWART BROWN, Project Manager, NMSS

ANN HODGDON, Senior Attorney, OGC

GENE STANLEY, Vice President of Nuclear Operations, Commonwealth Edison

ROY CANIANO, Deputy Director, NMSS

ETOY HYLTON, Licensing Assistant

DAVE WRONA, Project Manager

JIM WILSON, Environment Specialist

ROY LEEMON, Reactor Decommissioning Inspector

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ROLAND LICKUS, Region III, State Liaison Officer

RICH TUETKEN

KEN AINGER

P R O C E E D I N G S

[7:00 p.m.]

MR. CIONI: Good evening, everybody. My name is Pete Cioni, and I am going to be chairing the beginning of this meeting, and then I will turn it over to ComEd and the NRC. But, first of all, I would like to just make a couple of comments.

I would first like to say I was the co-chair for the Community Advisory Panel. We were set up by ComEd as a means for them sharing information and explaining the process that they were going through in the shutdown of the Zion Nuclear Station as they put it into what is known as SAFSTOR. And I would like to thank ComEd for their cooperation and for their endeavors in providing us with the information, answering questions and concerns that were raised by members of the Community Advisory Panel as we went through this process.

I would also like to thank the members of the CAP for their time given in sitting in on these meetings and participating, their sharing their concerns and having their questions answered, and, also, basically taking this information back to the various communities and organizations that they represented.

Before we begin the meeting then, I have to make just a couple of announcements as far as the protocol of this meeting. This meeting is being transcribed. There will be written transcripts of it. If you want a copy of the written transcription, there is a sign-up sheet that will be available over at the table. Also, the copies of the transcript will be placed upon the NRC web site.

When you get up to speak, since this is being transcribed, we request that you state your name, and if you could actually spell your last name, that would be helpful, and state who, if you are representing an organization, please indicate what organization. If

you are a resident, just indicate that.

We are going to allow the speakers to make their presentations first, and if you will hold your comments until they finish, and then you will be given an opportunity to ask your questions of those speakers.

There will be handouts available over here at the table regarding the shutdown process and information that may help you answer some of your questions. You can take those copies. If they run out of information, you can ask Mr. Hylton. Can you show where you have --

MS. HYLTON: Ms. Hylton. Right here.

MR. CIONI: Oh, okay. And she can get you information if they do run out.

Also, if you want to leave written comments, you can do that, and they can be responded to. Just leave your name and address, again, with Mr. Scaletti and he will provide you with that information.

After the meeting, representatives of the NRC and ComEd will be here and will be available. If you have additional questions you would like to present to them or discuss with them any particular matters, they will be here and be able to answer those questions for you.

So, for media folks here, that are here tonight, again, there will be representatives here for any interviews, and they will be available after the meeting.

So, with that, I would like to turn the meeting over to representatives both of ComEd and the NRC.

MR. STANLEY: Good evening. My name is Gene Stanley, I am Vice President of Nuclear Operations for Commonwealth Edison.

Next slide, please. The topics I would like to talk about tonight are the background, the

current plant status, what the planned decommissioning activities are, the estimate of expected decontamination costs, and decommissioning costs, the environmental impacts and a small conclusion. Next slide.

Zion Nuclear Power Station consists of two essentially identical pressurized water reactors, with the supporting facilities around them. The NRC licensed both units to operate in about 1973. The decision to permanently shut down Zion was made by Unicom and ComEd Board of Directors on January the 14th, 1998. On January the 15th, 1998, the decision was announced to the employees and then to the public.

The decision for permanent shutdown was solely based on economic analysis. Based upon the analysis, we concluded that the plant would be unable to produce competitively priced power in a deregulated market. Next slide.

We certified our permanent shutdown of the plant to the Nuclear Regulatory Commission by a letter dated February the 13th, 1998. We certified on March the 9th of the same year to the NRC that all fuel was permanently removed from the reactor vessels and placed in the spent fuel pool. Once we submitted these two letters, the plant's license no longer permitted nuclear operations. Our license will remain in effect, however, until terminated by the Nuclear Regulatory Commission.

On February the 14th of 2000, we submitted to the Nuclear Regulatory Commission the Post-Shutdown Decommissioning Activities Report referred to as a PSDAR. According to NRC regulations, the PSDAR must be submitted within two years of permanent plant shutdown and contain the following information: a description of planned decommissioning activities and the associated schedule; an estimate of expected decommissioning costs; and the reasons for concluding that any environmental impacts will be bounded by previously published Environmental Impact Studies. Next slide.

All of the 2,226 spent fuel bundles generated over the plant's lifetime is stored on-site in the spent fuel pool. Following shutdown, we converted the main generators to synchronous condensers for enhanced voltage control in this region of the service territory, that is, until other electrical generation takes the place of Zion Station. We expect to continue the use of the synchronous condensers through at least 2003.

A shutdown facility has much less need for support compared to when operating. Therefore, following permanent shutdown, we initially reduced the staff down to about 180 people. This size workforce was needed to place the plant into a safe long-term condition.

We are currently transitioning to a Long-Term Zion Decommissioning Organization. It will be in place by July the 15th of this year. This corresponds to when the plant will be in SAFSTOR, which we will talk about further. The long-term organization will have a permanent staffing level of about 50 people, plus the security force personnel. Next slide.

Our primary goal in the decommissioning of the plant is to safely and cost effectively remove or decontaminate plant systems and structures to allow the unrestricted use of the site.

The decommissioning of the plant has been divided into five periods. First is SAFSTOR preparations. Second is SAFSTOR dormancy. Third is preparation for decontamination and dismantlement. The actual decommissioning operations, and, finally, site restoration. Next slide.

SAFSTOR preparation is the period we are currently in at the plant. We have been getting the plant ready for SAFSTOR by de-energizing unnecessary plant equipment, draining selected plant systems and removing hazardous material from the station.

We have also created a spent fuel nuclear island out of the existing fuel handling building. We did this in order to simplify the support infrastructure needed for safe, long-term spent fuel storage during plant decommissioning. The spent fuel cooling and supporting systems were isolated from other plant systems. Spent fuel pool support equipment was consolidated in or near the fuel handling building. Next slide.

SAFSTOR dormancy is the next period the plant will enter. We currently plan on having the plant in SAFSTOR by July the 15th, this year. During SAFSTOR dormancy, the plant is in a safe, dormant condition for an extended period of time. During this period there will be minimal on-site activity. Plant personnel will maintain required systems and structures in a safe condition. We will continue to perform routine radiological and environmental surveillances to monitor the site. Systems and equipment which are no longer needed may be removed from the site. Next slide.

The next period will be the preparation for decontamination and dismantlement. In anticipation of beginning active decommissioning, we will assemble the organization needed to perform and support decontamination and dismantlement. During this period the following will also occur: preparation of work plans for decommissioning and dismantlement activities, and development of activity specifications and task-specific procedures. In addition, we will continue site characterization to identify, categorize and quantify all wastes. Next slide.

Decommissioning operations. During this period the plant will be decontaminated and dismantled. The spent fuel nuclear island, however, will remain operational until all the spent fuel is removed from on-site. Then it also will be decontaminated and dismantled. Piping and components from the plant will be removed, packaged and disposed of. The site buildings and facilities will be decontaminated.

Approximately two years prior to the expected completion of decommissioning, we will prepare and submit our license termination plan to the NRC for their approval. A final site radiological survey will be performed to demonstrate that the site can be released for unrestricted use. Once the survey is complete, we will request from the NRC to terminate the license. Next slide.

Low-level radioactive waste removed from the plant during decommissioning will be shipped off-site to a licensed burial facility. The law requires the Department of Energy to take title and custody of the spent fuel. The spent fuel will remain on-site until it is removed by the Department of Energy. We anticipate the first shipment of spent fuel from the plant to occur in approximately 2022, with the final shipment occurring in 2025. Next slide.

Site Restoration. This is the final period of decommissioning and begins after the licenses have been terminated by the Nuclear Regulatory Commission. Plant structures which were not removed as part of the decontamination and dismantlement operations will be demolished unless planned to be used in some other capacity. The site will be backfilled, graded and landscaped as needed, with site restoration scheduled to be completed about 2028.

The electrical switchyard will remain in order to support the existing off-site transmission and distribution system. Next slide.

The site-specific decommissioning cost estimate is approximately $904 million. This includes costs for spent fuel storage, but does not include any site restoration costs. We will have sufficient funds to complete plant decommissioning. This will be achieved through a combination of the Illinois Commerce Commission approved future collections and the growth of the existing decommissioning trust fund. Next slide.

We reviewed the final Environmental Impact Statement associated with normal operations of Zion Station and the Generic Environmental Impact Statements for decommissioning and radiological criteria for license termination. Based on our review, we concluded that the decommissioning activities planned for Zion Station are bounded by these Environmental Impact Statements. The SAFSTOR approach was already considered in these studies, as well as the standard construction based techniques planned for decontamination and dismantlement of Zion. Next slide.

In conclusion, for several years the plant will be in a safe, dormant condition. The plant will eventually be decontaminated and dismantled. We will have sufficient funds to pay for the costs associated with decommissioning the plant. The spent fuel will remain stored on-site until it is taken by the Department of Energy. The final end state for the plant will be the NRC licenses terminated and the site restored in 2028. Thank you.

MR. SCALETTI: Good evening, my name is Dino Scaletti. I am the NRC Project Manager for the Zion decommissioning. I would like to thank you for taking the time to come to this meeting tonight. I would like to thank Mr. Cioni for moderating this meeting and controlling it.

The purpose of this meeting tonight is for public information. We are required by our regulations to hold a public meeting. It also gives the opportunity for Commonwealth Edison to make their presentation, to tell you what is going on. It provides a forum for interested members of the public to be heard and transcribed, and NRC to review those comments and to appropriately address them.

Before I continue any further, I would like to take a moment to introduce the members of the NRC staff that are present tonight, and they will be here to -- following the meeting, they will stay around. If you have any questions you want to ask them directly, certainly

feel free to do so.

I would like to start with Mr. Roy Caniano, who is the Deputy Director of Division of Nuclear Materials and Safety. He is our senior NRC person tonight, so I would like to introduce him.

Dr. Michael Masnik, who is my immediate supervisor and head of the decommissioning section at U.S. Nuclear Reg. headquarters, Project Directorate for Decommissioning.

We have Mr. Bruce Jorgensen, who is from Region III, who will be following this presentation with a presentation of the inspection process for Zion, for the decommissioning process.

We have two other Project Managers from NRC who are here to assist us and will answer your questions, Mr. John Hickman and Mr. Dave Wrona.

Mr. Jim Wilson, who is our Environmental Specialist, who is here. Jim is here partly to do the environmental review of the PSDAR.

Then we have from the Office of Nuclear Materials Safety and Safeguards, Mr. Stewart Brown, a Project Manager, who is sitting at back.

Ms. Phillis Sobel is not here tonight.

Other Region III people who are here, Mr. Roy Leemon, I believe I saw him, he is president, he is a Reactor Decommissioning Inspector.

Ms. Pamela Alloway-Mueller, Public Affairs Officer, who is here to assist us tonight.

And I believe Roland Lickus is here from Region III, who is the State Liaison Officer, State and Government Liaison Officer.

Did I miss any of the Region III people?

[No response.]

MR. SCALETTI: Apparently not. And we have Ms. Ann Hodgdon, a Senior Attorney

from Office of General Counsel at headquarters.

Next slide, please.

Okay. A brief outline of the areas that we will talk about tonight are, you know, what is or isn't decommissioning? The NRC focus. Some decommissioning requirements, the Post-Shutdown Activities Report. You can read them there. And the NRC staff point of contact, which would be myself, in headquarters. And Mr. Bruce Jorgensen from the NRC will make a presentation following.

What is decommissioning? What isn't decommissioning? is probably easier. From the standpoint of the NRC, decommissioning only relates to the removal of the facility, residual radioactivity. Anything related to the removal of radioactive components, et cetera, is consider decommissioning. We do not consider decommissioning to be the removal of buildings that are not contaminated, structures after they have met our site restoration is something outside of decommissioning, in that once they have attained a certain radioactivity level to be able to release the site, any other expenses are not related decommissioning.

The spent fuel management plan is not a decommissioning cost. The Zion spent fuel pool management is something different than decommissioning as far as the NRC is concerned.

As I said, the NRC focus is on the removal of radiological hazards from the site, the removal of the facility from service, the reduction of radioactive materials, a detailed final radiological survey, which you just heard about, and if the survey is satisfactory, then the license can be terminated. Next slide.

This lists two alternatives to decommissioning. As you are aware, all decommissioning leads to removal of the facility’s radioactive material and components from the site, and

it has to be done within a period of 60 years. Zion has -- Commonwealth has taken the SAFSTOR approach for Zion for a period of about, I believe, 13-14 years before they start dismantling. But the rules, the regulations state that you have 60 years toe decommissioning and there are many sites that do a combination of both. You can decontaminate and dismantle immediately upon shutdown, or after you have filed a PSDAR report. You can start, or you can go into SAFSTOR and do this at a later date. But, eventually, it would mean removal of the facility's radioactive materials and components from the site.

The process starts with, you heard -- so I will just go over it briefly. The licensee certifies he is shutting down the facility. And I believe they have to notify the NRC within 30 days of that decision, that they have permanently ceased operations. They have to, again, certify when all the fuel has been removed from the reactor vessel and put into the spent fuel pool. These certifications are irreversible, you can't start the reactor back up again once you have certified you are shutdown.

Within two years of shutdown, you have to provide a Post-Shutdown Decommissioning Activities Report, which was submitted to us by Commonwealth on February 14th of this year. Also submitted, which is required, the site-specific cost estimate report came in at the same time. Following that, the long-term storage follows for Zion, as I said, for a period of time, and then dismantlement of the facility. So then the license is terminated, providing the survey is acceptable. Next slide, please.

The Post-Shutdown Decommissioning Activities Report. The report is required to provide a description of the planned decommissioning, which it does, and we do have copies that are at the table. If someone doesn't have a copy and would like one, they can notify me and we will see that you get one. Also, a schedule for the

accomplishment of these activities, and the estimated costs.

And also in there are the reasons for concluding that the Environmental Impacts of the Decommissioning fall within the bounds of the previously existed Final Environmental Impact Statement for Operations and the Generic Environmental Impact Statement for Decommissioning Facilities. The NRC has reviewed this and we are in the process of writing it up, but our findings appear to be that they are within the bounds of those two documents, and this will be made public shortly.

Also, another requirement is that the NRC hold a public meeting. We are here tonight. This is part of regulations. Also, the major decommissioning activities, as it states there, cannot be started until 90 days after the PSDAR has been submitted and, again, that was submitted in February, and we like to try to hold our public meetings within the 90 day period so that the public is fully aware of what is going on. Next. Thank you.

From the standpoint of the decommissioning trust fund, our regulations require that we have -- that a licensee have a decommissioning trust fund to assure that the reactor can be safely dismantled and removed from the site. Access to this trust fund is controlled. As it states there, a limit of 3 percent of the trust fund for decommissioning planning, a limit of 20 percent prior to receiving the site-specific cost estimate, and that is already in. So, in essence, the licensee would have full access to the decommissioning cost fund -- trust fund to decommission the facility. But we should make it known that the NRC constraints do not usurp any state constraints, local constraints, laws that would prohibit them from doing something different.

The additional restrictions are that the licensee cannot do anything that would foreclose the possibility of completing the decommissioning. It can't do anything that would result in, you know, significant environmental impacts, and they have to assure that -- and the

NRC checks that periodically, that there will be funding available to complete the decommissioning.

So, over a period of time, in this case, in Zion's case, it will be a few years. Within two years prior to terminating the license, the licensee has to submit a license termination plan. The plan describes site characterization, identification of any remaining dismantlement activities. It goes on, the details for the final radiation survey, description of the end use of the site if restrictions are imposed, and an update to the site-specific cost estimates, as well as an update to the operating environmental report.

Now, termination of a license is I would say a license action, so an environmental report would be required and the NRC would do an SER or an environmental assessment.

The plan, when it is received, will be noticed in the Federal Register. There will be an opportunity for hearing given in the Federal Register. Again, we will hold another public meeting to let individuals within the area address their concerns. Again, as I said, the plan will be approved by the issuance of a license amendment. And, again, the NRC, if we determine that we want to, if we feel it necessary, than we could do our own confirmatory survey, and then the license would be terminated if it meets the appropriate criteria.

We have considerable experience in decommissioning of nuclear power plants. There have been a number of plants that have been already decommissioned. There are a number of plants that are under decommissioning presently. It is estimated we have about 300 years worth of decommissioning experience within the NRC, and, so, Zion is something -- decommissioning of Zion is not a new activity.

As you can see, and I was told that Zion should be put up in the long-term storage category and not in the planning on SAFSTOR. So, it should be moved up one. So you

can see that we have six that are being decontaminated in process directly. It will be eight facilities in long-term storage, one planning for SAFSTOR. Well, none planning for SAFSTOR now because both Zion units are up there. And four facilities are planning a combination of SAFSTOR and partial dismantlement. So, there is a great deal of experience associated with decommissioning.

If you have any concerns, if you want to send any letters to the NRC, you want to ask any questions, ask for any reports that we have, you can address them to me at this address. It is pretty much U.S. Nuclear Regulatory Commission, Washington, D.C., with my name on it. It will get to me, the mail service works pretty well. If you put Mail Stop 11-D19, it may get there a little bit faster, but eventually it will end up with me. The telephone numbers are there. There is an 800 number, if you dial then 800 number, then you have to ask for 1104, extension 1104, if you dial direct, it is 301-415-1104 number. And my e-mail address is there, feel free to use it if you so desire and want to ask me a question.

So that concludes my presentation. At this time I would like to introduce Bruce Jorgensen from Region III to go forward.

MR. JORGENSEN: Thank you, Dino.

We had a public information meeting here in this very room two years ago, and I came and talked about the inspection program at that time. For anyone who was here then, I think what I will have to say tonight is going to sound rather familiar. It is subject to a couple of changes, probably the most important of which is change which has occurred at the plant itself as they have transitioned from a plant which was recently shut down and had hundreds of employees to a plant that is about to be in a long-term SAFSTOR dormant storage condition.

NRC is a federal regulatory agency. We are planners and organizers, we do things by the book. And although we are becoming paperless and we have provided access to a lot of public documents, virtually anything that we produce, our inspection reports, our procedures and practices are available electronically, I am just old-fashioned enough to want to be able to reach out and grab the procedure, or the manual chapter, or the inspection plan, so this is the book that we go by.

Talking about the inspection program means talking about NRC Manual Chapter 2561, that is the part of our internal instructions that directs what we do for inspection of decommissioning reactors. There are four inspection areas, you see them there on the slide. Normally, we would do about the same amount of inspection in each of those areas, and while the manual chapter is set up to address a decommissioning reactor in any condition, very busy, or all the way to almost nothing happening, we do spend some effort in all four areas, unless there is no fuel on-site. There is one reactor in Region III at Fermi in Detroit that has no fuel on-site, and so we are doing three of those areas. We also, although the program covers any plant in any condition, we custom tailor the inspection plan, and I will be talking about kind of two aspects of this all the way through, what the general program provides for any decommissioning plant, and, specifically, what we are doing at Zion, considering the conditions that are going to be in effect there. The individual areas I will talk about in a little bit more detail later in the presentation.

The purposes of the inspection program are to directly observe and verify activities to ensure compliance to our regulations in 10 CFR, to the conditions of the license, to the stipulations of the Post-Shutdown Decommissioning Activities Report, which has been talked about tonight, and to ensure adherence to requirements established in licensee

procedures.

We want to ensure that the approaches, the systems, the techniques that are being used are adequate to ensure safe storage of spent fuel. We want to identify if there are problems, in a manner that gets us involved, if necessary, to ensure that any problems are resolved. And we want to provide for effective use of NRC resources. Like many government agencies, NRC is a shrinking agency and we feel it is important to know that we are putting our attention where our attention ought to be placed.

As to making decisions on resource utilization, the main factors are, what is it exactly that the licensee is doing? And how well are doing it? And if there are performance issues that develop, problems in compliance, declining trends, then we feel it is our responsibility to intervene in that, to increase the inspection in any area if there is some uncertainty about whether things are being done the right way, to change the focus of the inspection and the program does provide for considerable flexibility, which is why we can tailor an inspection program to each facility, up to having meetings with the management of the licensee and engaging, if necessary, in enforcement actions.

Other aspects addressed in the manual chapter include the management meetings that I mentioned. Typically, those are done on an as-needed basis, not routinely. The master inspection plans -- and that is actually the tool we use to custom tailor an inspection program for each individual reactor site.

We have talked plants in decommissioning, plants in SAFSTOR. The manual chapter actually divides into active decommissioning and inactive. The categories match up fairly well. And over the last two years, obviously, Zion has been transitioning from a facility which was fairly active in a number of ways, to a facility which is going to be inactive in the future.

For calendar year 2000, our master inspection plan then is sort of a transition document. It provides for the minimum inspection program required at all plants, no matter how inactive, plus some extras that we consider appropriate for the activities that are going on at Zion. That is a published document, the master inspection plan is put together in organized fashion and mailed to the licensee and posted, where it is publicly available. Our program provides for some flexibility in use of resident inspectors immediately after a plant is shut down and we retained resident inspectors at Zion until July of '98. At that time we transitioned to inspection from the regional office, although we retained a facility at the plant for our use, because we were here very regularly until the end of fiscal year '99, about six months ago. The inspection in the future will be conducted on a visiting inspector basis, primarily from the Region III office is Lisle, with some individual specialty types of inspections from our headquarters office.

There is, in the unique case of the State of Illinois, a memorandum of understanding between NRC and the Illinois Department of Nuclear Safety. That has been in effect for a number of years. It provides that trained and qualified staff who work for the State of Illinois may inspect at power reactors for and on behalf of the Nuclear Regulatory Commission.

During 1999, a supplement to that memorandum of understanding was revised and the program was broadened to incorporate Illinois state inspectors in the program for inspection of decommissioning reactors. Illinois staff are highly qualified and trained to the same standards as NRC inspectors, have similar backgrounds and experience, and will be and are participating in the inspection program at Zion.

And everything we do gets documented inspection reports. We generate a report approximately each six weeks to two months, which provides a summary of what it was

that we examined in the preceding inspection period, what it was that we found, and, if necessary, what action was taken to deal with any problems that we identified.

Let's go back then to the four fundamental areas of inspection, and I just want to walk briefly through the titles of some inspection procedures in what we call our core inspection program, -- this is the program that is done at all facilities and will be done at Zion, -- because the titles I think are pretty much self-explanatory and illustrate the kinds of things we are interested in.

In the area of facility management and control, we inspect organization management and cost controls. Dino Scaletti mentioned the regulatory requirements relating to the decommissioning fund, and we do periodic verification that the fund is being managed within the bounds that are established in the regulation.

We have procedure called safety reviews, design changes and modifications, a part of the regulations called 50.59 that provides controls over the modification process in reactors, applies to reactors in the decommissioning phase, and we audit the company's program to ensure that they are implementing those requirements as necessary.

There is an inspection procedure on self-assessment, auditing and corrective action.

For a minimal program, and Zion is not to that point at present, but for a minimal program, core inspection could be as low as about 120 hours of direct on-site inspection per year. That means that we are not going to be at the site every day, so we need to be knowledgeable the processes that the licensee has put into effect to monitor his own performance. We need to have confidence that they are finding problems, if they are occurring, that they looking to the root cause and taking corrective actions so that problems don't repeat themselves. And this is our technique for doing that.

And we have a procedure for decommissioning performance and status review which is

sort of an overview.

There is a column there called "Inspection Hours," it is not very clear, but you see two sets of numbers. One of the flexibilities provided in the program is that the amount of inspection that we would do as a guideline at an inactive plant would involve less inspection hours than it would at an active plant. And so what you see in the two columns is about 14 hours a year looking at the organization, management and cost control where a plant is inactive, twice that much at an active decommissioning facility. Now, these hours are guidelines. We use them and refer to them, though, when we are building the inspection plan at the beginning of the year, but we have flexibility, as I indicated, if something is going particularly well, or not particularly well, to increase or decrease the amount of hours in a given inspection.

The second general area of inspection is decommissioning support activities. This includes things like maintenance and testing, dealing with cold weather, physical security and any independent spent fuel storage installation. That is not going to occur at Zion. The security procedure, inspection procedure unique to decommissioning reactors has not been written, and so we have an agreement within the Region III office that inspectors trained and having expertise in physical security inspection at the operating reactors will come and do the inspection at Zion, using their operating reactor inspection procedure as a guide, and we think that has worked well.

The third area is spent fuel safety. In a way, this is at the heart of the inspection program. From a radiological point of view, just about the only hazard left at the plant is represented by the fuel. That is where 99.9 percent of the radioactive material is. The fuel is all in one place now in the fuel pool. The intention is that it will reside there and be undisturbed for a number of years during the SAFSTOR condition.

This is an area where there is a great deal of flexibility, though, in the program, depending on whether there is inspection activity taking place on the fuel, whether things are being put in or out of the pool, whether the fuel itself may be moved for some reason to put it into casks or whatever. So the amount of inspection in this particular area of spent fuel safety can range over a particularly broad range.

And the last general area is entitled radiological safety. This is a program that probably changes less for a decommissioning reactor than most of the others, because our regulations in Part 20 apply in the same way in a decommissioning reactor as they do in an operating plant, or as they, for example, in a hospital at a nuclear medicine program. Control of exposures, control of contamination, handling of effluents and solid radioactive wastes.

There is a procedure entitled, I think it is the second one there, "Inspection of final surveys at permanently shutdown reactors." That can, depending on the magnitude of the decommissioning effort, be a fairly substantial effort on our part as well. In the past we have on occasion contracted with Oak Ridge National Laboratories to support an independent NRC survey of the entire site once it is cleaned and decommissioned in order to satisfy ourselves independently that there is no residual radioactivity in excess of our limits.

That is the inspection program. I look forward to your questions and comments and I will give the floor back to Peter Cioni.

MR. CIONI: Okay. Thank you. I guess right now we will open up the meeting for any comments or questions anybody has. If they would come to the microphone and address whatever speaker that they would like with the question, and, again, state your name for the person doing the transcription of this meeting, and they will try to answer

your question.

Is there anybody from the public?

[No response.]

MR. CIONI: Well, I guess everybody is pretty clear on what has happened at the Zion plant and -- I guess we have somebody coming forward. Okay.

MR. KENNEDY: Hi, I have a question. I am John Kennedy, a resident of Zion. My question would be for everybody. It is a two part question. Number one is fire. Can you explain what is going on like if something happens? Number two is security. The other part of the question is, when you guys decided to shut it down for now, did you talk to any like the working people that actually work in the plant to know which managers, which other union people, however you want to put it, know what they are doing and are qualified to be in the position they are in?

MR. CIONI: Who would like to address that?

MR. STANLEY: I will take that. I think, if I understand, it is fire, security, and how do we know that the people at the plant are qualified to do what they are doing? Did I catch it all?

At the plant, at any plant, we are required to respond to a fire initially and to protect the fire from spreading throughout the plant, even an operating plant, until we receive help from outside resources. And we have based, you know, in our plans to call in outside resources as we would at any other of the operating stations, including the Zion Fire Department.

Relative to security, once you shut down a plant from normal operations, then you provide to the NRC your new shutdown security plan. And it is really based, as the NRC stated tonight, your major emphasis is on the spent fuel once a plant has been shut

down. And that gives you a possibility of asking for some, I will say relaxation from your normal total site boundary, as we once knew it as it was operating. So, that gives you the ability to reduce the total numbers of security personnel and to bring back the boundary that you are actually protecting.

We submitted that plan, that plan has been approved for the NRC. We have implemented that plan and we have the required number of security personnel on-sit at all times to support the security plan.

Relative to the qualifications of the people on-site to do what they are required to do, the status of the people, the people really haven't changed. These people that have been here are the same people that were here when the plant was operating.

We went through a process where we allowed the most senior people from the bargaining unit to remain at the station, both through the transition plan and the long-term Zion decommissioned organization. So, what you will find at the station from a bargaining unit point of view are mostly senior people.

As far as the management is concerned, there was a group of managers that were kept at the station. Then we went through a process of selection of a final long-term decommissioning management organization. People had a chance to apply for positions that they wanted once those positions were announced. They were interviewed, evaluated and then, if there was some disagreement that someone wasn't selected that they thought they should be selected, we then had a board for them to go to and submit their case and the final management organization was announced sometime in January of this year.

So the people are the people that operated Zion. They are fully qualified. They have been qualified for a long period of time and they will be in place for a long period of time.

MR. JORGENSEN: From the NRC perspective, we do inspect fire protection. It is embedded in one of the support procedures. It is certainly the case, though, that fire protection requirements for a permanently shutdown plant are different than they were when the plant was operating. The main thing, I think, is that almost nothing needs to happen immediately or automatically in a permanently shutdown plant, because any hazard would take a long time to develop. And, so, the nature of the response can change.

As to security, that program changed also. I probably wouldn't say that the security requirements are reduced, but they are different. We don't discuss publicly what the specifics are, for obvious reasons, but that is part of the inspection program, and any change in the security requirements, NRC has to review and approve.

As far as staff and management qualifications, we don't have a long laundry list for permanently shutdown reactors of what positions have to be filled, and what the training and education and experience has to be for each position. There are, in some cases, those kinds of requirements for an operating plant. For an operating plant, NRC actually licenses and gives exams to members of the staff that are going to operate the plant. That is not the case in a permanently shutdown reactor.

MR. CIONI: Is there anybody else that has any questions?

MS. VOGELSBERG: Therese Vogelsberg, resident of Zion. I have come across some information that ComEd has applied to the NRC of changing the plant's name. NRC's decision was supposed to be coming out on April 30th. Do you guys know anything about it, and why is ComEd changing the name of the plant?

MR. STANLEY: We announced last year that we were planning to merge with another corporation called PECO in Pennsylvania, and, as a result of that, we proposed a new

name. Although that new name has not been finalized yet, the name is called Exelon versus what you would normally see as ComEd. This merger at the present time is scheduled to be finally approved, a possibility of August the 1st. That is the plan for now. And then that would change the name of Commonwealth Edison as we know it today to probably Exelon.

So, what you would see, as a resident of Zion Station, if that merger is finally approved, on day one of the merger approval, you would see the name of Commonwealth Edison being removed, a new branding strategy, the name of Exelon would go up on Zion Station. Zion Station would still remain Zion Station. Did that answer your question? Thank you.

MR. CIONI: Is there anybody else?

MS. KENNEDY: My name is Ginny Kennedy, I am a resident of Zion. I am also an employee at the power plant. My first question is I would like to know what the capacity of the fuel pool is, and what is the possibility of any other fuel being moved from any of the other nuclear sites that ComEd owns to Zion Station? And I have heard before that there is no possibility. I would like to know, do we have that in writing? Is there something that is going to guarantee that that is not going to happen?

MR. STANLEY: Okay. The total capacity of the fuel pool is something on the order of greater than 3,000 fuel bundles. As I mentioned in my talk, that we have 2,226 fuel bundles stored in the fuel pools. ComEd, Zion Station or any other of the Commonwealth Edison stations, they are not licensed to receive fuel from any other station, so there is no plans and we are not legally allowed to bring any fuel in from other stations.

MS. KENNEDY: Okay. I have a second question.

MR. MASNIK: I just might add to that that if they chose to do that, they would have to request a license amendment and there would be an opportunity for a hearing for that license amendment as well.

MS. KENNEDY: So it is still a possibility?

MR. MASNIK: Well, if they choose to pursue that, they would have to get permission from the NRC through a license amendment. But they haven't asked for it.

MS. KENNEDY: Okay. The second part is, I guess what my husband was referring to when he was talking about the management people at Zion Station, I also have a question about management people at Zion Station. We have had problems come up that have been identified by clerical staff, myself included, and I have a problem with the lowest clerk at Zion Station, the lowest level clerk bringing it to management's attention that we do not have qualified fire watch to be doing our welding and grinding at Zion Station. I had to bring it to their attention. I had to bring it to their attention we were behind on the training for first aid, for other required training.

I don't understand why it is not a management person that is on top of that and realizes what the requirements are for the training at Zion Station, why they are not aware of it, why they are not seeing to it that these people are properly trained.

And I would also like to know why it took myself to identify that there were 18 Xerox boxes full of surveillances from Zion Station that dated back into the '80s that were abandoned in one of the departments. It took how much argument on my part, I am not even sure, I went to supervisors, I went over supervisors' heads. I went to numerous people to identify that these records were abandoned in a department. They should be filmed, it was a requirement to film them.

It took argument on my part to get the people to realize that that is what should be done.

Oh, yes, when we finally go to look at it, then we realize, yes, that is what needs to be done, so we will do that. But these records were going to be thrown away.

We also have another department, the OAD department that is out in the power block. There is records abandoned there. That department was abandoned. The fire marshal's department over in the eight pack has been abandoned. There was records over there dating back to '92 on fire impairment barriers that were left over in that abandoned building, and I had to bring that to a supervisor's attention and argue to get those over in my possession so I can start preparing those for filming.

So when these types of things happen, it makes me feel uneasy, and it makes me feel unsure that things are being handled properly at Zion Station. I also am a resident. I will be gone in July from Zion Station. I will still live in Zion, and I have great concerns for the safety of Zion Station. Thank you.

MR. CIONI: Whoever would like to address that?

MR. STANLEY: Yeah, I will address it. Obviously, the retrieval and storage of documents is an important feature and not to contradict anything you said, but we appreciate the fact that you have identified issues to be corrected through the corrective action program.

If those documents have been left there since '92, obviously, it is not necessarily just the management, it has been there since the Zion shutdown that has been a problem.

MS. KENNEDY: Exactly. And that was part of my point, if these are the same management people that were there before, the same management people that are here now. The same supervisor who I have had to go to over and over and over again about problems, and who I get ignored by, and who I get told, it is not a problem, throw them away, and then I have to go over this particular supervisor's head, -- why is that

supervisor still there?

MR. STANLEY: That is probably a good question. I can't answer that. But we will do an audit of the records to make sure that the records are appropriately documented and put on microfilm for the future. So I will nuclear oversight do an audit of that from Downer's Grove. We appreciate you bringing that issue up.

I believe that the entire management team that remains at Zion Station for the decommissioning dormancy is adequate to manage the things that we need to do for the long-term shutdown mode that we will be in for several years.

MR. CIONI: Anybody else have any questions?

[No response.]

MR. CIONI: I guess if there is no one else, we will conclude this meeting this evening, unless anybody has any final comments. And just to state that the representatives here of ComEd and the NRC will be available after the meeting. If you have any other comments you would like to make, they would be glad to talk to you about them.

So, thank you very much for coming tonight and good-night.

[Whereupon, at 8:04 p.m., the meeting was concluded.]